

## UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

Brian Andrew Bushell

Tracey M.A. Stockton

Case No. 22-MJ-4506-DHH

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2020 to August 2022 in the county of Essex in the  
                     District of Massachusetts, the defendant(s) violated:

*Code Section*

18 U.S.C. 1349  
 18 U.S.C. 1956(h)

*Offense Description*

Conspiracy to commit wire fraud and conspiracy to commit unlawful monetary  
 transactions

This criminal complaint is based on these facts:

See attached Affidavit of FBI Special Agent Chad Oakes

☒ Continued on the attached sheet.

*Chad Oakes*  
 Complainant's signature

Special Agent Chad Oakes, FBI

Printed name and title

By telephone in accordance with Fed. R. Crim. P. 4.1.  
 Sworn to before me ~~and signed in my presence.~~

Date: Oct 11, 2022City and state: Worcester, Massachusetts

*David H. Hennessy*  
 Hon. David H. Hennessy, U.S. Magistrate Judge

Printed name and title